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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In Re:

FIRESTAR DIAMOND, INC., et al.,

Debtors.

Chapter 11

Case No. 18-10509 (SHL)

(Jointly Administered)

RICHARD LEVIN, Chapter 11 Trustee of
FIRESTAR DIAMOND, INC., FANTASY, INC.,
and OLD AJ, INC. f/k/a A. JAFFE, INC.,

Plaintiff,

v.

NIRAV DEEPAK MODI, MIHIR BHANSALI,
and AJAY GANDHI,

Defendants.

Adv. Proc. No. 19-01102-shl

**DECLARATION OF NICOLE A. SULLIVAN
IN SUPPORT OF DEFENDANT MIHIR BHANSALI'S MOTION FOR
RULE 11 SANCTIONS OR TO STRIKE CERTAIN PLEADINGS**

NICOLE A. SULLIVAN, an attorney duly admitted to practice law in the United
States Court of the Southern District of New York, states, under penalty of perjury, as follows:

1. I am a partner with the law firm of White and Williams LLP, counsel to Defendant Mihir Bhansali (“Defendant” or “Bhansali”) in the above-captioned proceeding. I submit this declaration in support of Defendant Mihir Bhansali’s Motion for Rule 11 Sanctions or to Strike Certain Pleadings (the “Motion”). I am familiar with the facts set forth herein based upon my own personal knowledge and upon my review of the records and materials produced in and relevant to this action.

2. A true and correct copy of the Trustee’s original Complaint, filed on or about March 27, 2019, is annexed hereto as **Exhibit A**.

3. A true and correct copy of the Case Docket is annexed hereto as **Exhibit B**.

4. A true and correct copy of the Trustee’s First Amended Complaint, dated September 20, 2019, is annexed hereto as **Exhibit C**.

5. A true and correct copy of Mr. Bhansali’s Rule 11 Letter, dated November 13, 2019, is annexed hereto as **Exhibit D**.

6. A true and correct copy of the Trustee’s Response to Mr. Bhansali’s Rule 11 Letter, dated December 2, 2019, is annexed hereto as **Exhibit E**.

7. A true and correct copy of the email correspondence to counsel for the Trustee dated February 2020 inquiring whether the Trustee had reconsidered his position is annexed hereto as **Exhibit F**.

8. A true and correct copy of original Complaint Under Section 5(5) of the Prevention of Money Laundering Act, 2002 for Confirmation of PAO No. 17/2018 Dated 05.10.2018 is annexed hereto as **Exhibit G**.

9. A true and correct copy of the Directorate of Enforcement’s Reply Submission on Appeal is annexed hereto as **Exhibit H**.

10. A true and correct copy of the bank statement for M.R. Family Trust for the period of May 31, 2007 through March 31, 2018 is annexed hereto as **Exhibit I**.

11. A true and correct copy of Mr. Bhansali's HSBC bank statement for the period of September 30, 2017 to October 31, 2017 is annexed hereto as **Exhibit J**.

12. A true and correct copy of the summary of the witness statements in the Indian Court Criminal Case against Nirav Modi is annexed hereto as **Exhibit K**.

Dated: New York, New York
March 31, 2020

/s/ Nicole A. Sullivan
Nicole A. Sullivan